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U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1

The Texas Farm Bureau (TFB) appreciates the opportunity to comment on the Draft Strategic Plan and Draft Program Standards documents for the National Animal Identification System (NAIS). TFB strongly supports the establishment and implementation of a national animal identification system capable of providing support for animal disease control and eradication, as well as enhancing food safety. Various forms of livestock identification have been utilized by our members for production purposes and identification of their livestock. The concept of a uniform national system of animal identification has received increasing attention within our organization in recent years.

Private-Public Partnership

Farm Bureau continues to provide input on the NAIS through the USAIP species working-group framework. Farm Bureau appreciates the input from a grassroots framework in the feedback model for NAIS development. We encourage USDA to continue working closely with Farm Bureau and the livestock industry to ensure that producer perspectives guide the implementation of an animal identification system. We strongly believe this is the best approach to enhance producer participation in a voluntary system and then move into a mandatory system when problems are resolved through pilot projects.

Identification Technology

The NAIS Cattle Industry Working Group has recommended the all cattle use ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry. Technology neutral would require all individuals to have multiple means of identifying livestock. Each species should determine what type identification device will work best for their group and work with USDA to specify that type of technology.

Issues

- 1. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring and response system to support federal animal health programs?**

Yes, for the system to work effectively and protect the nation's high standards of animal health, the program must be mandatory. A tracking system that does not have 100% participation in the program cannot be successful. However, a mandatory animal identification program should not be implemented before three key issues are adequately addressed: the cost of the system, ensuring the confidentiality of data submitted by producers and protecting producers from undue liability.

- 2. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.**

Animals should be identified prior to entering commerce. This can be done at the original premise, a tagging station or at the point of sale for a fee. The manager of the premises should be responsible for ensuring proper identification be applied prior to completing the animal movement. The purchaser should be responsible for compliance with reporting movement requirements. Producers should be aware, that market or exhibition managers would have the authority to reject an unidentified animal under a mandatory program.

- 3. Can markets or other locations successfully provide a tagging service to producers who are unable to tag their cattle at their farms?**

Markets will provide this type of service for its customers for a nominal fee or possibly for the cost of the tag. Some markets are already providing services to work cattle and transport them to and from the market so this would just be an additional service. We do not expect markets or other location managers to be required to provide such a service. Central tagging locations or individual work crews with portable pens and chutes could be established for producers who do not have adequate on-farm resources to apply identification devices. The option of establishing cooperative identification stations, both in conjunction with and independent of markets should also be reviewed as implementation of the NAIS progresses. The question here is, who will maintain the data, how much will it cost and how long will the data need to be kept?

- 4. In what manner should compliance with the identification and movement reporting requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?**

The manager of the original premises (i.e., seller) should be responsible for identification requirements, while the manager of the receiving premises (i.e., buyer) should be responsible for movement reporting requirements. The integrity of the system is best served if both the seller and buyer report movement data.

- 5. Is the recommendation that animals be identified prior to entering commerce or being commingled with animals from other premises adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered?**

The animals must be identified prior to entering commerce or being commingled with animals from other premises in order to achieve timely traceback capabilities. Only after entering commerce or being commingled does the risk of disease transmission expand beyond the animal's original premises. A timeframe or age limit for identifying animals should not be mandated. This should be the producer's prerogative to identify animals for production information on the original premise.

- 6. Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)?**

The timeline for implementing the NAIS on a voluntary basis is realistic. Without experience of the expense, labor and overall compliance involved for the producer as well as the custodians of information, implementing a program of this size, could prove to be an overwhelming project. Production systems have already been developed and are operational that can be modified to implement a traceability component into the programs. Producers will more likely feel comfortable and better educated about the concept of animal identification for health traceability once the concept has proven workable in marketing chains.

- 7. Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed?**

When fully implemented, all livestock species should be covered by the NAIS – including cattle, bison, swine, sheep, goats, horses, poultry, alpacas, llamas, deer, elk and aquaculture. Although we believe that implementation emphasis should be initially targeted to producers of cattle, then swine and sheep. The protocols for individual Animal Identification Numbers should be uniformly applicable to all species, while recognizing species differences in physiology and management for reporting movement requirements, such as allowing group/lot identification for poultry and swine.

- 8. What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other**

factors make some methods for information submission more or less practical, costly, or efficient?

The most efficient method for submitting database information is electronic. An e-mail based data sharing system should be used by USDA, state officials and private data base companies. Private entities (producers, markets, processors, etc.) should be encouraged to use e-mail to transfer data quickly and accurately. Other options such as facsimile, postal mail and/or telephone reporting must be available to accommodate entities that do not have access to web-based technology.

9. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

The owner's name, contact information, specific locations of the animals (premise) should be the most protected information. This data needs to be held confidential and should not be subject to the Freedom of Information Act.

10. How could we best minimize the burden associated with providing information and maintaining records? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

To minimize the record maintenance and data submission burden, requiring reporting by only one party is adequate. The buyer/manager of the receiving premises should be responsible for compliance with reporting movement requirements. The seller/manager of the original premises should be able to report the movement if so desired for his own management and recordkeeping purposes, but should not be required to do so.

APHIS is also requesting comment regarding a privately managed database for holding animal location and movement information, and asks for public feedback on the following issues:

1. How should a private database system be funded?

In order to evaluate the cost of a private database system, an accurate cost estimate for a federal government-managed system is necessary. There is no question that financial expense will be associated with either a public or private database system. However, the cost of establishing, operating, and maintaining the system in either sector is, at this point, primarily an issue for speculation. Until an overall cost estimate is formulated, it is very difficult to determine how the system – public or private – should be funded and virtually impossible to estimate who should and will pay what portion of that cost. A privately held database should be able to operate at the same cost as a public database.

2. Should the NAIS allow for multiple privately managed databases?

The NAIS should allow multiple privately-managed databases to submit the required animal health-tracking information to a common database. Animal identification and animal movement information should be accessible only by APHIS or State Animal Health officials for disease traceability. Allowing multiple privately-managed databases to serve the function of one common, uniform database for disease tracking creates duplicate costs, slows the traceability process and causes unnecessary confusion in both the industry and the animal health community.

3. Should a public (government) system be made available as well as a privately managed system so that producers have a choice?

The database should be privately held entity with a board of directors and not by any particular livestock group. It should be the umbrella database to which the necessary animal health information from each of the privately-managed premise identification systems is submitted, either by producers directly or as a service of their chosen system.

4. Should a privately managed system include all species?

If a privately managed database were chosen to hold animal location and movement information, it must include all species. Since some diseases affect multi species it will be necessary to maintain all in one database. Due to the timely and cross-species nature of disease tracking, uniformity throughout the livestock sector is critical to achieve the stated goal of 48-hour full traceability.

5. Would either system work equally well at the state level? Please explain why or why not. When and under what circumstances should the program transition from voluntary to mandatory?

This could work, however, without knowing which state an animal originated from, time could be lost until this was determined. One integrated system connecting all states and industry is the preferred solution to reduce potential financial and time management burdens.

Thank you for the opportunity to submit these comments to the public record. We look forward to continuing our working partnership with USDA on the NAIS.

Sincerely,



Kenneth Dierschke
President

KD:JJ:dp